



SOWELL GRAY STEPP & LAFFITTE, LLC
ATTORNEYS AND COUNSELORS AT LAW

December 3, 2003

VIA HAND DELIVERY

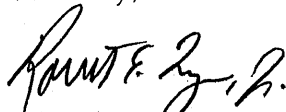
The Honorable Bruce Duke
Acting Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Discovery in Docket No. 2003-326-C
SGS&L File No. 5671/1500

Dear Mr. Duke:

Enclosed for filing, please find the originals and 15 copies of Competitor Carriers of the South, Inc.'s First Set of Interrogatories to BellSouth Telecommunications, Inc. in the referenced Docket. By copy of this correspondence I am serving the same on parties of interest. Please stamp the extra copies provided as proof of filing and return them to our courier.

Sincerely,


Robert E. Tyson, Jr.

Robert E. Tyson, Jr.
rtyson@sowell.com

/alh

Enclosures

cc: Sent via email
F. David Butler, General Counsel
Florence P. Belser, Executive Assistant to Commissioners
Elliot F. Elam, Jr., Esquire
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**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2003-326-C

IN RE:

Analysis of Continued Availability of)
Unbundled Local Switching for Mass Market)
Customers Pursuant to the Federal)
Communication Commission's Triennial)
Review Order)

**COMPETITIVE CARRIERS OF THE SOUTH, INC.'S
FIRST SET OF INTERROGATORIES
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

Competitive Carriers of the South, Inc. ("CompSouth"), hereby serves its First Set of Interrogatories to BellSouth Telecommunications, Inc. ("BellSouth").

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc. and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth.
2. The terms "you" and "your" refer to BellSouth.
3. "CompSouth" means Competitive Carriers of the South, Inc., their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of CompSouth.
4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" also means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring

within the scope of these discovery requests and information what would not otherwise not be brought within their scope.

9. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

10. Unless otherwise stated, information requests refer to the state of South Carolina.

11. "Access Line" refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems ("DLC") that is used for serving residential and small business customers. "Access Line" does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

12. Digital Loop Carrier ("DLC") includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation).

13. "CLEC" means a "Competitive Local Exchange Carrier," and "local exchange provider" as defined in 47 U.S.C. § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U.S.C. § 251(h).

14. "EEL" refers to Enhanced Extended Link.

15. "ILEC" refers to Incumbent Local Exchange Carrier.

16. "CLLI" refers to Common Language Location Identifier.

17. "LATA" refers to Local Access and Transport Area.

18. "UNE" refers to Unbundled Network Element.

19. "UNE-L" refers to Unbundled Network Element-Loop.

20. "UNE-P" refers to Unbundled Network Element -Platform.

21. "DS1" refers to Digital Signal, Level 1.

22. "MSA" refers to Metropolitan Statistical Area.

23. "DS3" refers to Digital Signal, Level 3.

INSTRUCTIONS

1. If you contend that a document in response to any document request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such document in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any document request cannot be fully complied with, comply to the extent possible and specify the reasons for your inability to comply fully.

4. These document requests are continuing in nature and pursuant to the Rules and Regulations of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure require supplemental responses should additional documents become available.

INTERROGATORIES

1. For each BellSouth wire center in South Carolina, please provide the following information for the wire center in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. The UNE pricing zone;
- b. The Special Access Zone Density Pricing zone;
- c. The MSA the wire center predominately serves;
- d. The LATA;
- e. Identify whether BellSouth enjoys special access pricing flexibility for that wire center.

2. For each BellSouth wire center in South Carolina, please provide the number of loops, by type listed below, provisioned to CLECs in the past 3 months in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. UNE analog loop;
- b. UNE DS-1 loop;
- c. Analog special access;
- d. DS-1 special access;
- e. UNE-P (residential);
- f. UNE-P (business);
- g. Other.
- h. Please provide the statewide total for (a) through (g).

3. For each BellSouth wire center in South Carolina, please provide the number of loops, by type listed below, provisioned to CLECs in the past 6 months in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. UNE analog loop;
- b. UNE DS-1 loop;
- c. Analog special access;
- d. DS-1 special access;
- e. UNE-P (residential);
- f. UNE-P (business);
- g. Other.
- h. Please provide the statewide total for (a) through (g).

4. For each BellSouth wire center in South Carolina, please provide the number of loops, by type listed below, provisioned to CLECs in the past 12 months in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. UNE analog loop;
- b. UNE DS-1 loop;
- c. Analog special access;
- d. DS-1 special access;
- e. UNE-P (residential);
- f. UNE-P (business);
- g. Other.
- h. Please provide the statewide total for (a) through (g).

5. For each BellSouth wire center in South Carolina, for the most recent quarter for which the information is available, please provide the number of switched access lines in electronic spreadsheet form (i.e., as an Excel Spreadsheet), separately for:

- a. Business analog lines;
- b. Residential analog lines;
- c. Business digital lines (measured in voice grade equivalents);
- d. Please identify the conversion factors used in (c) above.
- e. Please provide the statewide total for (a) through (d).

6. For each BellSouth wire center in South Carolina, for the most recent quarter for which the information is available, please provide the number of special access lines provided to end-users (i.e., not provided to CLECs) in electronic spreadsheet form (i.e., as an Excel Spreadsheet), separately between:

- a. DS-1 special access lines;
- b. DS-3 special access lines.
- c. Please provide the statewide total for (a) and (b).

7. Provide the number of EELs in service in South Carolina at the end of the most recent quarter for which such information is available, stated separately for:

- a. EELs comprised of analog loops that are connected to analog transport;

- b. EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport;
- c. EELs comprised of DS-1 loops that are connected to DS-1 transport;
- d. EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport.

8. For the last quarter for which such information is available, provide in electronic spreadsheet form (i.e., as an Excel Spreadsheet) by end-office in South Carolina (by applicable CLLI code) the CLLI of the tandem switch on which the end-office homes;

9. Provide the number of EEL local connections, in DS-1 equivalents, by BellSouth wire center in South Carolina for each quarter since the fourth quarter of 1999.

10. With regard to business customers using 24 or fewer analog lines, identify the number of customer locations by the number of switched local service lines in the following table:

Lines	Number of Customer Locations
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	

11. For the last quarter for which such information is available, provide by end-office in South Carolina (by applicable CLLI code) in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. The CLLI of the tandem switch on which the end-office homes;
- b. The number of shared transport (i.e. transport used in conjunction with unbundled local switching) minutes originating from the end-office;
- c. The number of shared transport minutes terminating to the end-office.

12. For the same period as the information provided in the previous question, please provide in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. The total number of interconnection trunks and interconnection minutes at each tandem, separated between:
 - i. Originating trunks and the minutes carried by those trunks;
 - ii. Terminating trunks and the minutes carried by those trunks;
 - iii. Two-ways trunks and the minutes carried by those trunks.
- b. The number of additional trunk terminations available on each tandem;
- c. The number of additional trunk terminations available on each end-office.

13. Provide the number, for the most recent time period for which data is available, of UNE loops served by IDLC and NGDLC arrangements in South Carolina that have been provided to a CLEC:

- a. With unbundled local switching;
- b. Without unbundled local switching.

14. Please state the applicable charges, if any, and the amount of time it takes to transfer a customer's IDLC loop to:

- a. UDLC;
- b. spare copper.

15. During the past 5 years, has BellSouth ever added processor capacity or peripheral equipment to one or more of its local switches due to:

- a. Increased usage;
- b. Exhaust of the number of end-user lines that could be connected to the switch.

16. If the answer to either part of the previous question above is yes, please identify:

- a. The nature of the upgrade performed;
- b. Whether BellSouth had other end-office switches within a 15-mile radius with capacity to handle additional lines;
- c. If the answer to b. is yes, whether BellSouth considered off-loading subscriber lines from the switch requiring the upgrade, and serving those lines from a different local switch. If BellSouth did not consider doing so, why not?

17. What percentage of the local minutes originating in South Carolina terminate at the same end-office where they originate?

18. For South Carolina wire centers located near the edge of an MSA boundary, please explain the methodology used to assign (or not assign) the wire center to a MSA.

19. Provide the number of presubscribed long-distance customers located inside BellSouth's incumbent local exchange areas in South Carolina for the most recent period for which data is available.

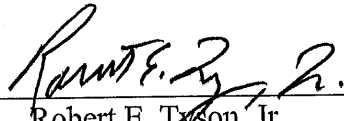
20. Provide the number of presubscribed long-distance customers located outside BellSouth's incumbent local exchange areas in South Carolina for the most recent period for which data is available.

21. For the most recent quarter for which the information is available, provide the:

- a. Total number of UNE-P lines in South Carolina;
- b. Total billed revenues for unbundled local switching, shared transport and any charges for call detail records/access records billed UNE-P carriers in South Carolina.

22. List every end office (by CLLI) in South Carolina currently using the AIN 1.0 Call Model or equivalent to provide a service, feature or function.

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Attorneys for Competitive Carriers of the South,
Inc. ("CompSouth")

Columbia, South Carolina

December 3, 2003

CERTIFICATE OF SERVICE

I, the undersigned paralegal of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for CompSouth, do hereby certify that I have served a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

Pleadings: **Competitive Carriers of the South, Inc.'s First Set of Interrogatories to BellSouth Telecommunications, Inc.**

Counsel Served: Elliott F. Elam, Jr. Esquire
South Carolina Department of Consumer Affairs
Elam@dca.state.sc.us

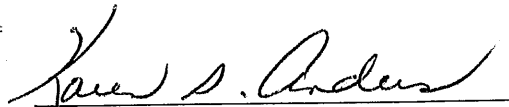
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Litigation Paralegal

December 3, 2003